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2 UNITED STATES DISTRICT COURT  
3 DISTRICT OF NEVADA

4 Michael Alexander,

Case No. 2:22-cv-01084-CDS-NJK

5 Plaintiff and Counter-defendant

Order Regarding the Continued Tracing of  
6 Alexander's Cryptocurrency

v.

7 Corey Chadwick,

[ECF No. 121]

8 Defendant and Counter-claimant  
910 On May 1, 2025, the court, having heard the testimony of expert witness Nicholas  
11 Himonidis, and having reviewed the pleadings, determined that continued tracing of  
12 Alexander's cryptocurrency and a protective order is necessary in furtherance of and in  
13 connection with the order dated October 15, 2024 (ECF No. 86). It is therefore ordered that:

- 14 1. The parties must work together so as to accomplish the disclosure necessary to compile  
15 a full forensic accounting of the transactions that have been identified in the chart  
16 identified in the February 7, 2025 NGH Report (Exhibit B thereto), as well as the  
17 transactions involving proceeds of cryptocurrency of plaintiff James Alexander which are  
18 the subject of this lawsuit and which relate to the time frame of February 21, 2019  
19 through the present.
- 20 2. Given the sensitive nature of the cryptocurrency records to be reviewed, the data  
21 provided under this order must only be viewed by Himonidis and his firm, NGH, who  
22 will only disclose his conclusions to Alexander's lawyers pursuant to the terms of this  
23 order. Himonidis has reviewed this order and agrees that he and his firm will be bound  
24 by the terms herein.

- 1       3. Defendant Corey Chadwick has retained a consulting expert to assist in this process.
- 2       The parties contemplate that Himonidis' company (NGH), Himonidis, and Chadwick's
- 3       consulting expert will work together to make sure that the necessary information is
- 4       accessed and to determine how much of the ultimate accounting and tracing can be
- 5       agreed to.
- 6       4. Subject to the terms of paragraph five below, Chadwick, through his expert, will provide
- 7       detailed transaction histories, including sent to and received from addresses, and
- 8       transaction hashes, for the following exchange accounts that were identified in the
- 9       February 2025 NGH report as having some connection to the cryptocurrency sourced
- 10      from Alexander's Binance account:
  - 11       a. Coinbase
  - 12       b. Poloniex
  - 13       c. Coinpayments.net
  - 14       d. Bitrue.com
  - 15       e. Uphold
  - 16       f. KuCoin
  - 17       g. Bittrex
  - 18       h. NEM(XEM) Address:  
19                    NA2KC36U4YIHDVMBEKGGFWBGOIVJMB5XAM7X2ETI
- 20      5. For now, Chadwick will only produce the information needed to Himonidis from the
- 21      KuCoin account. The parties agree that Himonidis will show Chadwick's consulting
- 22      expert the connection he found to Alexander's cryptocurrency to each of the other
- 23      exchanges/accounts listed in paragraph four above before Chadwick is required to
- 24      produce the data for the other seven accounts/exchanges listed. After the connection
- 25      details are given to Chadwick's consulting expert, Chadwick's consulting expert will
- 26      verify the connection between Alexander's cryptocurrency and the other

1 accounts/exchanges and will immediately provide the detailed transaction histories,  
2 including sent to and received from addresses, and transaction hashes, for remaining  
3 seven exchange accounts. Should there be any dispute between the experts, the experts  
4 shall report this dispute to counsel of record for the parties who shall attempt to resolve  
5 the dispute and give guidance to the experts.

6 6. Himonidis will only retain data related to transactions reasonably believed to represent  
7 proceeds of Alexander's cryptocurrency and will share all retained data with Chadwick's  
8 consulting expert. Should Himonidis believe he needs access to additional data, he shall  
9 communicate his need to Chadwick's consulting expert. Should there be any dispute  
10 between the experts as to whether data is within the scope of this order, the experts  
11 shall report this dispute to counsel of record for the parties who shall attempt to resolve  
12 the dispute and give guidance to the experts.

13 7. All information provided by Himonidis to Alexander's counsel shall only pertain to  
14 transactions reasonably believed to represent proceeds of Alexander's cryptocurrency,  
15 and shall describe account and wallet information only by identifying, in the case of an  
16 account, the location (platform) and name of the account, or in the case of a wallet, or  
17 DIFI exchange account identified by a wallet address, identifying the wallet by the first  
18 and last five digits of the root wallet address. Similarly, any report issued by any expert  
19 in this case shall only identify wallets and accounts in this manner. Because the expert  
20 disclosure deadline has passed, Chadwick's new consulting expert will not produce a  
21 report.

22 8. All information derived from the accessed information provided pursuant to this order,  
23 including any reports issued by Himonidis will be treated as "Attorney's Eyes Only" as  
24 described herein below.

- 1 9. All information required to be treated as "Attorney's Eyes Only" under this order will  
2 only be received and reviewed by Alexander's counsel of record, Himonidis, and his firm.  
3 Alexander's counsel of record must also promptly provide such information to  
4 Chadwick's counsel of record.<sup>1</sup>
- 5 10. All information required to be treated as "Attorney's Eyes Only" under this order will be  
6 used solely for the purpose of preparation and trial of this litigation and for no other  
7 purpose whatsoever and must not be disclosed to any person except in accordance with  
8 the terms hereof.
- 9 11. In the event that Alexander believes that any information required to be treated as  
10 "Attorney's Eyes Only" under this order is not of a confidential nature appropriate for the  
11 restrictions of this order, the parties will attempt to resolve the issues raised and  
12 stipulate in writing to designate such information as not subject to the restrictions of  
13 this order; if no resolution can be reached by the parties, Alexander may seek an order  
14 from this Court finding that such information is outside the scope of this order.
- 15 12. Nothing in this order prevents the parties, by written stipulation signed by the parties,  
16 to provide for exceptions to this order.
- 17 13. In the event a party wishes to use any information required to be treated as "Attorney's  
18 Eyes Only" under this order in any affidavits, briefs, memoranda of law, or other papers  
19 filed in court in this litigation, such information used therein must be filed under seal  
20 with the court. The Clerk of this Court is directed to maintain under seal all such  
21 documents filed under seal with the court in this litigation. However, the court may  
22 issue an order directing the parties to support their request to file any documents  
23 under seal.<sup>2</sup> The court will determine procedures it deems appropriate for use of any  
24 such documents or information at trial or any evidentiary hearing.

25  
26<sup>1</sup> The restrictions in this order do not apply to Chadwick, his counsel, or any expert hired by him.

<sup>2</sup> This requirement (and emphasis) has been added by the court.

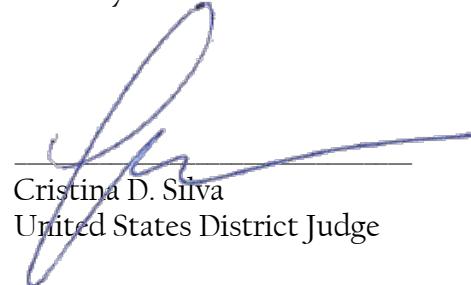
1 14. Within sixty days after conclusion of this litigation and any appeal thereof: (a)  
2 Alexander's counsel of record must turn over to Chadwick's counsel of record all  
3 documents and copies of documents which are subject to this order; and (b) Himonidis  
4 must destroy, retaining no copies, of all data he received or obtained pursuant to this  
5 order.

6 15. All confidential information subject to this order, produced or exchanged in the course of  
7 this litigation, will be used solely for the purpose of preparation and trial of this  
8 litigation and for no other purpose whatsoever, and must not be disclosed to any person  
9 except in accordance with the terms hereof, unless required by Federal or State law,  
10 administrative proceeding, appeal or other order of a State or Federal court.

11 16. The documents and requested information needed by Himonidis to complete the tracing  
12 and accounting of the proceeds of Alexander's cryptocurrency must be provided to NGH  
13 by June 30, 2025. A notice of compliance must be filed on June 30, 2025.

14 17. This order incorporates the signatures of the parties included in the draft order of the  
15 protective order filed at ECF No. 121 as if fully set forth herein.

16 Dated: May 29, 2025



17  
18 Cristina D. Silva  
19 United States District Judge  
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